

6093



GARY R. HERBERT  
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Lieutenant Governor

# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
Executive Director

### Division of Oil, Gas and Mining

JOHN R. BAZA  
Division Director

June 11, 2014

Rick York  
Intrepid Potash – Wendover LLC  
Hwy 279 Potash Road  
P.O. Box 1208  
Moab, Utah 84532

Subject: Second Review of Updated Notice of Intention to Commence Large Mining Operations and Reclamation Cost Estimate, Intrepid Potash-Wendover LLC, Bonneville Wendover Mine, M/045/0002, Tooele County, Utah

Dear Mr. York:

The Division of Oil, Gas and Mining has reviewed the referenced modified Notice of Intention to Commence Large Mining Operations (Notice) and reclamation cost estimate which were received May 28, 2014. The attached comments will need to be addressed before they are approved.

Please provide form MR-REV with your final submittal to clearly delineate the location for the submittals to be incorporated into the plan.

The comments are listed under the applicable Minerals Rule heading; please format your response in a similar fashion using redline and strikeout text. Please submit your response to this review by July 12, 2014.

Please contact Leslie Heppler (lah) at 801-538-5257, Wayne Western (whw) at 801-538-5263, or me at 801-538-5261 if you have questions regarding the review.

Sincerely,

Paul B. Baker  
Minerals Program Manager

PBB: lah: eb

Attachment: Review

cc: BLM State office and Salt Lake Field Office (SPerkes@blm.gov, SAllen@blm.gov), Nick Ganders - Nick.Glander@foth.com  
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**SECOND REVIEW OF BOND ESCALATION**  
**Bonneville Plant/ Reilly Wendover**  
**Intrepid Potash – Wendover LLC**

**M/045/0002**  
**June 11, 2014**

**R647-4-105 - Maps, Drawings & Photographs**

**General Comments and General Map Comments**

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
1	General	Please stamp all <i>new</i> maps submitted. This is a BLM requirement.	lah	
2	Section 1.0 Table 1.9	Table 1.9 should include the Federal ROW as a subsection to the table.	lah/ BLM	
3	Figure 6.2 and 6.	Figures 6.2 and 6.9, and Drawings 1.3, 1.11, 1.12, and 3.1 thru 3.2 need to be modified to delineate the BLM ROW (vs. BLM Leases). The BLM ROW areas are related to the brackish wells. Please modify all applicable maps.	lah/ BLM	
4	Drawings	Reclamation Features - Drawings 6.3, 6.4, 6.7, and 6.8 need to be updated to include the newest ditches. Please also include the brine flow direction. This is to be done for both scales of maps.	lah/ BLM	
5	Drawing 6.7	On reclamation Features - Drawing 6.7, please include the new pump station. This is to be done for both scales of maps.	lah/ BLM	
6	Figure 6.8	Check the pump station location and add the ditch from the pump station to the pond.	lah/ BLM	
7	General	All 11"x17" drawings and figures submitted need to have the font size scaled for drawing, as was done for figures submitted on May 28, 2014.	lah	

**105.3 - Drawings or Cross Sections (slopes, roads, pads, etc.)**

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
8	Page 4 – TechMemo	As previous written "OGM agrees revegetation is not required on the salt flats, but the area of the brackish wells and the process building should be revegetated after demo. Please provide a map with the area (8.5"x11" should be adequate) and line items in the bond for revegetation for the limited areas."  The Division recommends seeding with iodine bush ( <i>Allenrolfea occidentalis</i> ) and greasewood ( <i>Sarcobatus vermiculatus</i> ). Saltgrass ( <i>Distichlis spicata</i> ) may also grow in these areas.	lah  PBB	

**R647-4-113 – Surety**

Comment #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
9	Tables	Please include reference numbers for Means costs.	whw	



Second Review

Page 3 of 3

M/045/0002

June 11, 2014

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
10	Tables	<p>Haul costs: please state the Means reference number for the truck which includes rental and operating cost. Also include driver.</p> <p>01 54 33 20 5310 18 cy monthly rental rate \$4,275/month /176hr/month = \$24.29/hr  Hourly operation cost \$72.75/hr  Trhv \$56.05/hr include overhead and profit  Overhead and profit 10%  <math>((\\$24.29/\text{hr} + \\$72.75/\text{hr}) 1.1) = \\$133.46/\text{hr}</math>  <math>\\$72.75 + 133.46 = \\$206.21/\text{hr}</math></p> <p>Please use \$206.21/hr for haul costs or show alternative costs.</p> <p>The forms might not be set up to show costs. Modification of the forms might be needed or a worksheet with the hourly trucking cost must be included.</p>	whw	
11	Tables	<p>Please include the Means reference number for concrete flooring demolition or supporting information.</p> <p>01 54 33 20 0349 11,000 ft lb hydraulic hammer monthly rental rate \$635.20/month  <math>\\$635.20/\text{month} / 176 \text{ hr/ month} = \\$3.61/\text{hr}</math>  Operating cost \$22.90/hr  01 54 33 20 0349 3 ½ cy excavator \$19,200/month  <math>\\$19,200/\text{month} / 176 \text{ hr/month} = \\$109.10/\text{hr}</math>  \$146.35/hr operating costs  Overhead and profit 10%  <math>(\\$3.61/\text{hr} + \\$22.90/\text{hr} + \\$109.10 + \\$146.35/\text{hr}) * 1.1 = \\$191.34/\text{hr}</math>  Eqmd \$71.75 including overhead and profit  <math>\\$191.34 + \\$71.75 = \\$263.09/\text{hr}</math></p> <p>Please use \$263.09/hr for concrete demolition or show alternative costs.  The forms might not be set up to show costs. Modification of the forms might be needed or a worksheet with the hourly concrete demolition cost must be included.</p>	whw	
12	Tables	Please provide backup information for the hammermill crusher.	whw	
13	Tables	<p>Please provide Means numbers or other backup data for a front end loader, dump trucks, and the dozer to be used in concrete demolition. Note: Means uses a class of equipment, not actual makes and models.</p> <p>For example G1030 has a cost to load rock of \$2.40/cy. Please us \$2.40/cy for loading or show alternative costs.</p>	whw	
14	Tables	Please include revegetation costs for brackish well and process building areas.	lah	
15		Please remove all salvage costs such as overhead power lines. The Division does not allow for salvage value because the Division cannot sell items from the site.	whw	
16		Please include as a line item Pond 7 pump.	whw/ BLM	